

Statement of Patrick Pizzella
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U.S. Department of Labor
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Good afternoon, Chairman Miller, Ranking Member Lynch, and Members of the Subcommittee. I am Patrick Pizzella, Assistant Secretary for Administration and Management, and Chief Information Officer for the Department of Labor (DOL). Thank you for inviting me here today to discuss DOL's efforts to reduce paperwork burdens through compliance with the Paperwork Reduction Act (PRA) and through burden reduction initiatives beyond what is statutorily required of the Department. I appreciate this opportunity to discuss DOL's responsibilities under the PRA, and our efforts to provide relief and fair treatment to all business owners and individuals.

DOL is committed to reducing the burdens that America's businesses and individuals deal with every day as a result of Federal regulations and paperwork. The Paperwork Reduction Act is an important tool for DOL, and all federal agencies, to use in reducing unnecessary burdens on the American public.

In carrying out DOL's broad and varied mission, the Department enforces more than 180 federal laws.

In administering these laws and related programs, the Department actively seeks to minimize the paperwork burden it imposes on the American public while maintaining its mission and fulfilling its statutory and programmatic responsibilities.

The Department has also successfully adopted Office of Management and Budget's (OMB) "zero tolerance" policy for PRA violations¹ and has not been cited for a PRA violation for three years.

Achieving the aforementioned results is no small task. DOL maintains approximately 400 active information collections in its inventory, which have a total burden of 166 million hours. Furthermore, this fiscal year the OCIO has reviewed over 100 information collection requests and on average reviews between 130 to 140 annually.

The Department remains committed to the goals of the PRA and continues to explore and implement new ways to reduce burden hours imposed on the public. To this end, since FY 2002, the Department has submitted twelve burden reduction initiatives to OMB, several of which have already resulted in a reduction of approximately 221,751 burden hours. The status of the Department's burden reduction initiatives as reported in its

¹ A violation of the PRA occurs when an Agency collects information from the public without OMB approval.

Information Collection Budget is noted in Attachment “A”. These initiatives involve three main burden-reduction strategies:

- comprehensive evaluation and updating of regulations;
- streamlined information collections; and
- deployment of automated information collection techniques.

The Department takes the PRA very seriously. As a mission-critical responsibility, DOL provides full management support and has established well-defined policies and procedures for implementing and managing the PRA. The following briefly discusses DOL’s PRA management structure.

The PRA requires each agency head to designate a Senior Official to carry out the responsibilities of the agency under the PRA. At DOL, this is the Chief Information Officer (CIO), who reports directly to the Secretary and is responsible for ensuring agency compliance with the PRA. Accordingly, the CIO established an independent process to evaluate proposed information collections and issued internal policy for implementing the Department’s information collection management program.

The Department of Labor Manual Series establishes DOL’s procedures for implementing its PRA program. This internal policy directive assigns to DOL sub-agency heads the responsibility of ensuring sub-agency compliance with the PRA and other applicable laws and policies.

Furthermore, the directive assigns DOL’s information collection management to the Departmental Clearance Officer and DOL sub-agency-level management to Agency Clearance Officers. Agency Clearance Officers manage the PRA in each DOL sub-agency and provide both in-depth programmatic and PRA expertise which further ensures that DOL’s information collections effectively meet the PRA’s requirements of “need” and “practical utility.”

As part of assigned duties, the Departmental Clearance Officer manages the day-to-day activities of implementing the PRA for the CIO. The Departmental Clearance Officer reviews information collection requirements contained in regulatory documents and in information collection requests to ensure:

- Legal authority or necessity for the collection of information;
- Compliance with the PRA, the E-gov Act, Privacy Act, and other applicable laws; and
- The collection imposes minimum burden on the public and offers practical utility.

Additionally, the Departmental Clearance Officer provides overall management of DOL’s information collection enterprise including but not limited to:

- Managing efforts to reduce DOL's public paperwork burden in accordance with the President's Management Agenda;
- Coordinating information collection activity with OMB and DOL agencies;
- Conducting public consultations as required by the PRA;
- Providing training and technical assistance on PRA requirements;
- Managing data associated with DOL's information collection inventory; and
- Providing leadership for identifying and implementing burden reduction strategies.

Throughout the year, the Departmental Clearance Officer collaborates with Agency Clearance Officers to:

- Monitor program performance against the ICB to ensure that reported goals are realized;
- Evaluate program activities to ensure compliance with the PRA; and
- Manage the life-cycle of existing collections of information to ensure continued need, effectiveness, efficiency, and utility and to ensure that expiring collections are submitted to OMB in a timely manner.

Through its rigorous internal review process, the Department aggressively controls the amount of burden it imposes on the American public and ensures practical utility of its information collections with five main strategies:

1. Review of Rulemaking Actions: This strategy ensures regulatory actions are based on mission critical needs and impose minimum practicable burden. The review ensures that the public burden has maximum practical utility and public benefit.
2. Assessing the Use of Technology: This strategy involves implementing the Government Paperwork Elimination Act of 1998, the Clinger-Cohen Act, and E-Government Act of 2002 By Strategically deploying automated information collection techniques in order to reduce public paperwork burdens.
3. Routine Review of Information Collection Activities: This strategy involves carefully assessing all new information collection requests and all collections of information seeking extended OMB approval for programmatic necessity, legal authority, maximum practical utility and public benefit, and burden reduction strategies.

4. Burden Reduction Initiatives: This strategy involves initiating systemic enterprise-level efforts through Departmental burden reduction initiatives. Specific initiatives were previously noted in this testimony and are discussed in detail in Attachment A.
5. Public Consultation: To help ensure the practical utility of information it collects, including the frequency and collection methods, the Department relies heavily on the public consultation process required by the PRA. Key stakeholders and industry experts are consulted as part of the Department's rulemaking process and interested parties as well as the general public are afforded two opportunities to comment on proposed information collection activities, which collectively provide the public 90 days to provide input on the practical utility of DOL's information collections as well as provide insights for reducing the burden they impose.

Through a rigorous internal review process and aggressive burden reduction strategies, the Department of Labor is committed to reducing the paperwork burden on the American public. In addition, the Department has a very strong program of compliance assistance to help all businesses comply with our requirements.

That concludes my prepared testimony. I would be happy to answer questions you may have.

ATTACHMENTS

Attachment A -- Labor Department Information Collection Budget Burden Reduction Initiatives Status Report.

Attachment B -- Accounting of Labor Department Burden Changes.